

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

David P. Donovan,

Plaintiff,

v.

Beth A. Wilkinson,

Defendant.

Civil Action No. 1:20-cv-1344

**NOTICE OF FILING A MOTION TO SEAL**

Pursuant to Local Civil Rule 5, Defendant provides this Notice of Filing a Motion to Seal. Parties and non-parties may submit memoranda<sup>1</sup> in support or in opposition to the Motion to File Defendant's Prehearing Memorandum Under Seal within seven (7) days. If no objection is filed within seven (7) days, the Court may treat the motion as uncontested.

Dated: November 20, 2020

Respectfully submitted,

Defendant

By: /s/ Thomas G. Connolly

Thomas G. Connolly (VA Bar No. 29164)

Thomas B. Mason (*pro hac vice forthcoming*)

Jared Paul Marx (VA Bar No. 91213)

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<sup>1</sup> All or parts of these memoranda may be designated as confidential.

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused a true copy of the foregoing to be served by  
ECF on the following:

Cathy A. Hinger  
Lela M. Ames  
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Dated: November 20, 2020

/s/ Thomas G. Connolly  
Thomas G. Connolly